

# **EXHIBIT D**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

-against-

RICHARD XIA, a/k/a YI XIA, and  
FLEET NEW YORK METROPOLITAN  
REGIONAL CENTER, LLC, f/k/a FEDERAL  
NEW YORK METROPOLITAN REGIONAL  
CENTER, LLC,

Defendants,

-and-

JULIA YUE, a/k/a JIQING YUE,

Relief Defendant.

21-cv-05350-PKC-CLP

**PLAINTIFF'S FIRST SET OF INTERROGATORIES TO  
DEFENDANT RICHARD XIA**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33.3, Plaintiff Securities and Exchange Commission requests that defendant Richard Xia answer the following Interrogatories in writing and under oath within three (3) days of the date of this request, as provided for in Section V of the the Order to Show Cause dated September 27, 2021.

**DEFINITIONS**

1. The Uniform Definitions in Discovery Requests set forth in Local Civil Rule 26.3 apply to these Requests, and are incorporated herein.
2. "Middle Neck Road Property" mean the property located at [REDACTED] Middle Neck Road, Sands Point, NY 11050.



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3. "Kings Point Road Property" means the property located at [REDACTED] Kings Point Road, Kings Point NY 11024.
4. "Verfenstein" means Xi Verfenstein and any person or entity acting on her behalf.
5. "Yue" means relief defendant Julia Yue and any person or entity acting on her behalf.

### **INSTRUCTIONS**

1. The information requested in these Interrogatories constitutes a continuing request for such information, requiring you to supplement your responses.
2. You are requested to answer each Interrogatory, including each subpart of each Interrogatory. If you decline to provide information responsive to any Interrogatory or subpart of any Interrogatory, you must provide the basis for the withholding of information, as required by Federal Rule of Civil Procedure 33(b)(4).

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1**

Identify any consideration or value provided by Verfenstein in exchange for the Middle Neck Road Property.

#### **INTERROGATORY NO. 2**

Identify the sources of funds used to purchase the Middle Neck Road Property.

#### **INTERROGATORY NO. 3**

Identify any consideration or value provided by Yue in exchange for the Kings Point Road Property.

#### **INTERROGATORY NO. 4**

Identify the sources of funds used to purchase the Kings Point Road Property.

Dated: New York, New York  
November 8, 2021

SECURITIES AND EXCHANGE COMMISSION

*/s/ David Stoelting*

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